

EXHIBIT B

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4 - - -
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6 In Re: : Case No. 3:23-md-
7 : 03084-CRB (LJC)
8 :
9 UBER TECHNOLOGIES, :
10 INC., PASSENGER SEXUAL :
11 ASSAULT LITIGATION :
12 - - -
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14 FRIDAY, OCTOBER 24, 2025
15 - - -
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17 Remote Zoom Videotape Deposition of
18 VERONIQUE VALLIERE, Psy.D., taken pursuant to
19 Notice, in Allentown, Pennsylvania, commencing
20 at approximately 9:15 a.m., on the above date,
21 before Rose A. Tamburri, RPR, CM, CCR, CRR,
22 USCRA Speed and Accuracy Champion and Notary
23 Public.
24 - - -
25

Job No. CS7675941

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1 THE WITNESS: It -- it depends.

2 BY MR. LOVE:

3 Q. Now, we've talked about this before,
4 but I just -- I want to make sure that we have
5 a clear answer.

6 Do you believe that there is no
7 environment that is 100 percent free of the
8 risk of sexual assault?

9 MS. LUHANA: Objection to form.
10 Objection to the hypothetical.

11 THE WITNESS: In the extreme
12 situation, I do not believe that if an
13 offender is determined to offend, that they
14 will offend.

15 But it is not true that every
16 environment is at risk or can be a high risk.
17 It's never a zero risk, but it's -- there are
18 environments that are much higher risk and
19 there's many things we can do that will deter
20 offenders.

21 BY MR. LOVE:

22 Q. Just to make sure I understand, I
23 understand that there are higher risks and
24 lower risks, but you said there is never zero
25 risk.